

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

In re: Valsartan Products Liability

Litigation	:	MDL No. 2875
<hr/> This document relates to: RBK	:	No. 1:20-md-5010-
Plaintiff, Thomas Kelly	:	Hon. Robert B. Kugler
Plaintiff, Cheryl Ann Kelly Williams	:	Hon. Karen M.

PLAINTIFFS' STATEMENT PURSUANT TO L. CIV.

R. 7.1.1

Plaintiffs, Thomas and Cheryl Ann Kelly, submit the following information pursuant to L.

Civ. R. 7.1.1:

1. Plaintiffs are not receiving any funding of attorneys' fees and expenses in exchange for either (1) contingent financial interest based upon the results of the litigation or (2) a non-monetary result that is not in the nature of a personal or bank loan or insurance.

2. As set forth in Paragraph 1, Plaintiffs are not receiving any third-party funding of attorneys' fees and expenses, therefore no funder approval is necessary for litigation decisions or settlement decisions in the action.

Dated 08/02/2021

/s/Honora M. Gathings

Honora M. Gathings

Lloyd W. Gathings

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